

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ROME DIVISION**

EARL PARRIS, JR., individually,)
and on behalf of a class of persons)
similarly situated,)
)
Plaintiff,)
) Case No. 4:21-cv-00040-TWT
v.)
)
3M COMPANY, *et al.*,)
)
Defendants.)

**3M COMPANY'S MOTION TO DISMISS PLAINTIFF'S
FIRST AMENDED COMPLAINT**

Defendant 3M Company ("3M") respectfully moves the Court to dismiss Plaintiff's First Amended Complaint under Federal Rules of Civil Procedure 8(a) and 12(b)(6) for failure to state a claim. As described in its Brief in Support of its Motion to Dismiss, which is filed contemporaneously with this Motion, Plaintiff's Amended Complaint is deficiently pleaded, does not allege facts that would support any claim for relief against 3M, fails as a matter of law to state any legally actionable claims against 3M, and is otherwise legally meritless.

WHEREFORE, 3M respectfully requests that the Court grant this Motion and enter an order dismissing with prejudice Plaintiff's Amended Complaint in its entirety as to 3M.

Respectfully submitted this 13th day of May, 2021.

/s/ Robert B. Remar

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**CERTIFICATE OF SERVICE
AND COMPLIANCE WITH LOCAL RULE 5.1**

I hereby certify that I have this date electronically filed the within and foregoing, which has been prepared using 14-point Times New Roman font, with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all attorneys of record.

Dated: May 13, 2021.

/s/ Robert B. Remar

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